

DEC 10, 1997

DEC  
Bruce Venner, Chief  
Bureau of Federal Case Management  
Department of Environmental Protection  
P. O. Box CN-028  
Trenton New Jersey 08625

Re: L.E. Carpenter Superfund Site, Wharton Borough, Morris  
County, New Jersey

Dear Mr. Venner:

- The United States Environmental Protection Agency (EPA) is in receipt of your letter dated November 12, 1997 regarding the above referenced site. Your letter stated that based on guidelines outlined in the Technical Requirements for Site Remediation, Subchapter 3.10. (N.J.A.C. 7:26E), ten soils samples, rather than the twenty to thirty that EPA proposed in my October 24, 1997 letter, are sufficient for the conduct of a background soil study. In addition, you felt that the data was "not being collected for risk assessment purposes." Please note that EPA has reconsidered its position based on the information provided in your letter and I would like to reiterate that twenty samples is the minimum necessary for such a study and that ten samples will not satisfactorily resolve the problem of whether site soils are indicative of background concentrations, especially with respect to lead.

As the background soils study has been proposed as the most appropriate means of obtaining data that will be used to decide whether or not to modify the remedy selected in the April 1994 Record of Decision (ROD), it is important to satisfy the minimum requirements dictated by EPA policy. As outlined in my October 24, 1997 letter, twenty to thirty samples was selected based on discussions with EPA risk assessment experts, as well as on EPA's "Guidance for Data Usability in Risk Assessment (Part A), April 1992"; and, "Risk Assessment Guidance for Superfund Volume 1, Human Health Evaluation Manual (Part A), December 1989". In addition, please note that the reference you cited outlines ten samples as a minimum number, to be used as a guideline and that more samples may be necessary based on site specific circumstances. Moreover, EPA considers both human health and

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ecological risk to be important considerations when making a decision to modify a selected remedy for a Superfund Site. The collection and evaluation of the proposed new soils data clearly is a risk assessment issue. Bear in mind that as we are trying to determine background levels of lead for a broad area outside the site, in addition to the number of samples collected, the location of background samples must be carefully considered.

In addition, it may prove to be beneficial for the background study to include either isotopic analyses or lead speciation analysis for a certain number of off-site and on-site samples. This will help to establish a fingerprint for lead associated with mines located in the area versus lead that is site related. EPA would like to review the draft plan for additional soil samples when it is submitted by the Potentially Responsible Party.

Should you have any questions or wish to discuss this matter further please do not hesitate to give me a call at (212) 637-4418, or have your staff call Stephen Cipot at (212) 637-4411.

Sincerely yours,

Carole Petersen, Chief  
New Jersey Remediation Branch

bcc: Stephen Cipot, SNRJS  
Sharri Stevens, BTAG  
Mark Maddaloni, PSB